

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

**Jointly Administered under
Case No. 08-45257**

Petters Company, Inc., et al.,
Debtors.

Court File No. 08-45257

(includes:
Petters Group Worldwide, LLC;
PC Funding, LLC;
Thousand Lakes, LLC;
SPF Funding, LLC;
PL Ltd., Inc.;
Edge One LLC;
MGC Finance, Inc.;
PAC Funding, LLC;
Palm Beach Finance Holdings, Inc.)

Court Files Nos.:
08-45258 (GFK)
08-45326 (GFK)
08-45327 (GFK)
08-45328 (GFK)
08-45329 (GFK)
08-45330 (GFK)
08-45331 (GFK)
08-45371 (GFK)
08-45392 (GFK)

Chapter 11 Cases
Judge Gregory F. Kishel

Douglas A. Kelley, in his capacity as the
court-appointed Chapter 11 Trustee of
Debtors Petters Company, Inc. and
PL Ltd., Inc.,

Plaintiff,

vs.

ADV. NO. 10-04396

Westford Special Situations Master Fund, L.P.;
et al.,

Defendants.

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that, pursuant to 11 U.S.C. § 1109(b) and Rule 9010 of the Federal Rules of Bankruptcy Procedure, Marcus A. Ploeger of Briggs and Morgan, P.A., located at the address listed below, hereby enters his appearance in the above-captioned adversary

proceeding as counsel for Epsilon Global Active Value Fund II, Ltd. (“Epsilon II Feeder Fund”), a defendant in the above-captioned adversary proceeding.

Pursuant to Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy Procedure, the undersigned requests that an entry be made on the Clerk’s Matrix in this case, and that all notices given or required to be given and all papers served or required to be served in this case by the Debtor, the Court or any other party in interest be given to and served upon:

Marcus A. Ploeger
Briggs and Morgan, P.A.
2200 IDS Center
80 South 8th Street
Minneapolis, MN 55402
Phone: 612-977-8832
Fax: 612-977-8650
Email: mploeger@briggs.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, statement of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone facsimile transmission, telegraph, telex, or otherwise filed or made in this case.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Notices and Papers has been filed in compliance with the requirements of this Court’s order of January 21, 2011 and this Notice of Appearance and Request for Services of Notices and Papers shall not be deemed or construed as a consent to jurisdiction or as a waiver of any applicable right of the Epsilon II Feeder Fund to: (1) to have final orders in noncore matters entered only after *de novo* review by a United States District Court Judge; (2) a trial by jury in

any proceedings so triable in these cases or any case, controversy, or proceedings related to these cases; (3) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, setoffs, or recoupments to which Epsilon II Feeder Fund is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Epsilon II Feeder Fund expressly reserves.

Dated: February 18, 2011

BRIGGS AND MORGAN, P.A.

By: /s/ Marcus A. Ploeger

Marcus A. Ploeger (#0390172)

2200 IDS Center

80 South 8th Street

Minneapolis, MN 55402

Telephone: (612) 977-8400

Facsimile: (612) 977 8650

Email: mploeger@briggs.com

*Counsel to Epsilon Global Active Value Fund II,
Ltd.*

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Plaintiff,

vs.

ADV. NO. 10-04396

Westford Special Situations Master Fund, L.P.;
et al.,

Defendants.

CERTIFICATE OF SERVICE

I, Marcus A. Ploeger, certify that on February 18, 2011, I caused the Notice of Appearance and Request for Service of Notices and Papers of Marcus A. Ploeger to be filed electronically with the Clerk of Court through ECF, and that ECF will send an e-notice of the electronic filing to the following:

- Adam C Ballinger aballinger@lindquist.com, ddavis@lindquist.com

- Theodore T Chung ttchung@jonesday.com
- Tara A Fumerton tfumerton@jonesday.com, daralevinson@jonesday.com
- Kirstin D. Kanski kkanski@lindquist.com, cfunk@lindquist.com
- Tobias S Keller tkeller@jonesday.com
- David C Kiernan dkiernan@jonesday.com
- Robert T. Kugler robert.kugler@leonard.com, ma.xiong@leonard.com
- Mark D Larsen mlarsen@lindquist.com, ddaun@lindquist.com
- James A. Lodoen jlodoen@lindquist.com, gluessenheide@lindquist.com
- Daniel E Reidy dereidy@jonesday.com, Ma.Xiong@leonard.com
- Jeffrey D. Smith jsmith@lindquist.com, ddavis@lindquist.com
- Daryle Uphoff duphoff@lindquist.com

I further certify that I caused a copy of the foregoing documents to be sent via U.S. Mail to the following non-ECF participants:

Capital Strategies Fund Ltd.
HWR Services Limited
Craigmuir Chambers
PO Box 71
Road Town, Tortola,

Epsilon Active Value Fund II, Ltd.
HWR Services Limited
Craigmuir Chambers
PO Box 71
Road Town, Tortola,

Epsilon Global Active Value Fund I-B, Ltd.
HWR Services Limited
Craigmuir Chambers
PO Box 71
Road Town, Tortola,

Epsilon Global Active Value Fund II-B, Ltd.
HWR Services Limited
Craigmuir Chambers
PO Box 71
Road Town, Tortola,

Epsilon Global Active Value Fund II-G, L.P.
National Registered Agents
160 Greentree Drive
Suite 101
Dover, DE 19904

Epsilon Global Active Value Fund II-G, Ltd.

HWR Services Limited
Craigmuir Chambers
PO Box 71
Road Town, Tortola,

Epsilon Global Active Value Fund III Ltd
c/o Steve Goran Stevanovich
7521 Isla Verde Way
Delray Beach, FL 33446

Epsilon Global Active Value Fund III Ltd.
HWR Services Limited
Craigmuir Chambers
PO Box 71
Road Town, Tortola,

Epsilon Global Active Value Fund, Ltd.
HWR Services Limited
Craigmuir Chambers
PO Box 71
Road Town, Tortola,

Epsilon Global Asset Management, Ltd.
PO Box 309, Ugland House
South Church Street
George Town
Grand Cayman, KY1-1104

Epsilon Global Master Fund II, L.P.
PO Box 309, Ugland House
South Church Street
George Town
Grand Cayman, KY1-1104

Epsilon Global Master Fund III - Structured Strategies, L.P.
HWR Services Limited
Craigmuir Chambers
PO Box 71
Road Town, Tortola,

Epsilon Global Master Fund III - Structured Strategies, L.P.
c/o Steve Goran Stevanovich
7521 Isla Verde Way
Delray Beach, FL 33446

Epsilon Global Master Fund L.P.

PO Box 309, Ugland House
South Church Street
George Town
Grand Cayman, KY1-1104

Epsilon Investment Management, LLC
First Canadian Place
100 King Street West
Suite 5715
Toronto M5X 1 A9, Ontario

Stafford Towne, Ltd
c/o HWR Services Limited
Craigmuir Chambers
PO Box 71
Road Town, Tortola

Stafford Towne, Ltd.
7280 W. Palmetto Park Road
Boca Raton, FL 33433

Westford Asset Management, LLC
First Canadian Place
100 King Street West
Suite 5715
Toronto M5X 1 A9, Ontario

Westford Global Asset Management, Ltd.
PO Box 309, Ugland House
South Church Street
George Town
Grand Cayman, KY1-1104

Westford Special Situations Fund Ltd.
HWR Services Limited
Craigmuir Chambers
PO Box 71
Road Town, Tortola,

Dated: February 18, 2011

/s/ Marcus A. Ploeger

Marcus A. Ploeger
Briggs and Morgan, P.A.
80 South 8th Street, Suite 2200
Minneapolis, MN 55402